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April 12, 1999

USDA/FSIS Hearing Clerk
300 12th St. S.W. Room 102 Cotton Annex
Washington D.C. 20250-3700

The enclosed was sent to this docket in January but we see no record of it on the internet web page.

We would like to re-submit these comments for inclusion and posting in the USDA docket web page.

If you have any questions please call me at 651-293-2557.

A handwritten signature in cursive script that reads "Jeff Peterson".

Jeffrey K. Peterson
Director, Government Relations, Public Affairs

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Ecolab Inc.
Research, Development & Engineering
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F. William Tuominen
Senior Vice President
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January 5, 1999

F. WILLIAM TUOMINEN, Ph.D
SENIOR VICE PRESIDENT AND CHIEF TECHNICAL
AN-D ENVIRON-MENTAL OFFICER
ECOLAB INC.

COMMENTS PRESIDENT'S COUNCIL FOR FOOD SAFETY

I appreciate the opportunity to share Ecolab's vision for the future of food safety as part of the strategic plan currently being implemented.

Ecolab is the leading global developer and marketer of premium cleaning, sanitizing and maintenance products and services for the hospitality, institutional and industrial markets.

The issue of food safety permeates virtually every aspect of our business and the customers who use our products. From the stainless steel pipes carrying milk into a dairy to the raw fruits and vegetables being brought to market to the food preparation areas in restaurants across the country - our products and systems are called into action to clean, sanitize, and protect against disease-causing organisms.

In realty, our responsibility for food safety translates into the larger role of protecting public health.

To that end, the implications for your task become even more critical.

In assessing our role in this process, we have to look to the other components of the food production and preparation chain - many of whom are our customers.

Whether it be farmers, distributors, processors, retailers, food preparers or servers - from farm to table we contribute to their efforts to deliver safe and healthy food.

We offer the following points of emphasis:

(1) Intervention: A Higher Priority

In the litany of deficiencies associated with the current U.S. food safety system, the NAS report places too much emphasis on surveillance and oversight functions. More attention should be given to active intervention in attacking existing conditions or prevention of potential problems which threaten the viability of our food supply.

There are existing products, systems and procedures, which, if used more aggressively and consistently will diminish food contamination with less dependence upon expensive inspection and detection measures.

In addition, new solutions to attacking food contamination sources have to be designed and made available on a timely basis. Government, at all levels, has to encourage and apply resources to facilitate progress in this area with the private sector.

We agree with the report by the Committee to Ensure Food From Production to Consumption suggesting prevention and implementing Hazard Analysis Critical Control Point (HACCP) should take precedent over traditional sensory inspection procedures.

(2) Focus and Integration: A Key to Efficiency

A consensus seems to be emerging that the multiple federal agencies responsible for varied elements of food safety should be brought together into a more unified or coordinated mode. A number of models for doing this can be explored.

In following this general theme, however, we suggest the following:

- * Any new agency or individual should not create new layers of bureaucracy duplicating offices and functions that continue to exist. Failure to weed out in a consolidation scheme will only guarantee diminished efficiency.

- * A truly integrated food safety system must allow for innovation and initiative through new technology and procedures to create new systems for dealing with protecting our food supply. New and revolutionary thinking and research must be promoted to help us break away from the status quo. The private sector can and will step up to the challenge if barriers are removed by government.

- * With the many facets of food production it is no wonder there are many paths to reaching a consistent standard of safety. Commodities such as poultry, seafood, and fresh fruits and vegetables may require similar treatment but getting government approval from separate agencies often involves re-inventing the wheel for each round of product approval. We continue to see duplication of effort and parallel processes that don't intersect.

(3) Accelerate Research and New Technology.

Policy decisions and fiscal incentives must enable and encourage the private sector to develop new systems and products for addressing the food safety problems. The marketplace will spawn innovative solutions to the demand food producers are seeking

the role for government should be to create time and financial incentives for new product development.

Through grants, tax credits and other funding mechanisms, we can jump-start ideas in the research labs that might otherwise not see the light of day.

Where government agencies must approve new technologies, barriers must be broken to eliminate unnecessary delays through bureaucratic paperwork. Currently, our industry is stifled when we cannot bring revolutionary product offerings to our customers because of excessive review and approval sign offs. Today the complete approval process is required even before the product can be field tested to determine commercial viability. We need revisions in policy which would allow for limited field tests in parallel with the approval process. This would encourage more research and development.

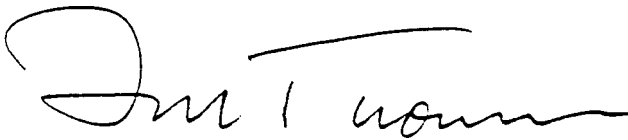
CONCLUSION

Beyond the points outlined above, Ecolab is eager to participate in this dialogue on food safety. We share the view of the National Restaurant Association, a strong element of our customer base. The private sector has to be a full partner in the planning and on-going implementation of a system as charged to the President's Council for Food Safety.

As with many other groups and companies, we have already begun to seek new answers to the issues highlighted in the NAS report. We know we can do more if we have the vehicle for sharing our expertise in shaping significant public policy.

Ecolab is committed to joining you in a partnership for developing a strategy and equally as important, following up in the implementation.

Follow up to these remarks should be directed to Dr. Bruce Cords; Vice President for Research and Development; Food and Beverage Division at Ecolab. He can be reached at 65 1-306-5771.

A handwritten signature in black ink, appearing to read 'F. W. Tuominen', with a long horizontal stroke extending to the right.

F. W. Tuominen
Senior Vice President And
Chief Technical and Environmental Officer

FWT:rk